



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

960025
EC-2

March 26, 1996

Reply To
Attn Of: ECO-088

Ref: 94-069-AFS

Dave Cottrell
Petersburg Ranger District
Tongass National Forest
15 12th Street
Petersburg, Alaska 99833

Dear Mr. Cottrell:

In accordance with our responsibilities under the National Environmental Policy Act and §309 of the Clean Air Act, we have reviewed the Draft Environmental Impact Statement (draft EIS) for the proposed **Port Houghton/Cape Fanshaw Timber Sale Project**. The draft EIS analyzes four action alternatives to harvest between 116 and 123 million board feet of timber from about 5,471 to 7,244 acres on the Southeast Alaska mainland, approximately 30 miles northwest of Petersburg, Alaska. The draft EIS identifies Alternative B as the preferred action alternative.

Based on our review, we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). This rating and a summary of our comments will be published in the *Federal Register*.

Our primary concerns, which are related to the potential impacts of the project on water quality and the marine environment, are highlighted below.

- 1) We are concerned about the potential impacts of existing and proposed log transfer facilities (LTFs) on the marine environment. Information in the draft EIS suggests that the proposed LTF at Little Lagoon may not conform with Alaska Timber Task Force recommendations for siting LTFs. Additionally, the EIS fails to address potential impacts associated with the use of the existing LTF at Hobart Bay. Because Hobart Bay has been identified as an impaired water body by the State of Alaska under Section 303 of the Clean Water Act, it is critical that direct project-related impacts to Hobart Bay be fully evaluated in the EIS.
- 2) We are concerned that the proposed project may adversely impact water quality and fish habitat in watersheds within the project area. Information presented in the draft EIS suggests that the Robert Islands Creek, West and East Fork Negro Creek, and Walter Island Creek watersheds would be particularly vulnerable to impacts from road

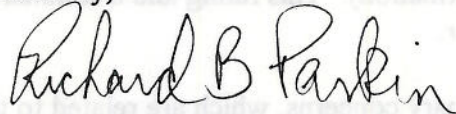
construction and harvest activities.

- 3) We are concerned with the lack of a clear commitment to implement applicable mitigation measures. The final EIS should present a clear description of the mitigation measures to be employed with project implementation, along with a clear commitment to implement those measures.
- 4) We are concerned with the lack of a clear commitment to perform effectiveness monitoring related to impacts on water quality/fish habitat and the marine environment. The monitoring proposals for evaluating LTF bark accumulation and post-sale road use should be expanded in the final EIS to address this concern. Furthermore, the final EIS should discuss monitoring efforts which have been planned or conducted consistent with Monitoring Plans developed specifically for the Stikine and Chatham Areas.
- 5) The draft EIS fails to evaluate environmental effects outside of the project area. The final EIS should include such analyses to satisfy the implementing regulations for the National Environmental Policy Act.

Enclosed please find our detailed comments, which elaborate further on these issues as well as other areas of concern we believe need to be addressed in the final EIS. We are interested in working closely with the Forest Service in the resolution of these issues and I encourage you to contact Bill Ryan at (206) 553-8561 at your earliest convenience to discuss our comments and how they might best be addressed.

Thank you for the opportunity to review this draft EIS.

Sincerely,



Richard B. Parkin, Manager
Geographic Implementation Unit

Enclosure

cc: Jim Ferguson, ADEC
NMFS
ADFG
COE-Alaska District

Detailed Comments for
Port Houghton/Cape Fanshaw Timber Sale Project
Draft Environmental Impact Statement (draft EIS)

Log Transfer Facilities

The proposed action alternatives discussed in the draft EIS would utilize an existing log transfer facility (LTF) at Hobart Bay and potentially up to three (3) new LTFs located at Little Lagoon, Rabbit Cove, and North Point. The proposed action alternatives B, C, and D would utilize one (1) existing log transfer facility at Hobart Bay. The final EIS should address the potential site-specific impacts to the marine environment from the continued operation of the existing LTF. The impacts may be significant and may warrant further evaluation.

Although the Hobart Bay LTF is located outside the Port Houghton/Cape Fanshaw Timber Sale Project Area, NEPA requires full disclosure of potential environmental impacts associated with the proposed federal action. The final EIS should provide additional site-specific information related to the current conditions of the existing Hobart Bay LTF. This information should include (1) an evaluation of the biological resources, (2) delineation of the areal extent and outer boundary of bark accumulation, and (3) estimates of the thickness and percent cover of bark debris. The additional information is required to allow our agency and the public to evaluate whether accumulation of bark from the continued operation of the Hobart Bay LTF site may result in a direct and/or cumulative impact to the marine environment. Furthermore, the final EIS should include a description of the existing LTF, including (1) transfer devices (e.g., cranes, low-angle slide, A-frames (single or double with a mechanism for controlling speed), log slides, log bundle conveyors, drive down ramps, etc.), and sorting and storage areas; and (2) past estimate of timber volume (MMBF) handled by the existing LTF.

We are concerned with the potential impacts associated with the development of the Little Lagoon LTF. Table K-1 of the draft EIS indicates that the site does not comply with many of the recommendations of the ATTF for siting LTFs. For example, the site would be located within 300 feet of the mouth of a Class I anadromous fish stream. The site would also be located within 0.5 miles of a known Pacific herring spawning area. Based on those criteria, this site would appear to be inconsistent with the ATTF siting guideline S1. Furthermore, the site would be located in a highly productive hardshell clam area. This appears to be inconsistent with ATTF siting guideline S7 related to the protection of shellfish. Table K-1 also presents seemingly conflicting information related to the ability of the area to effectively disperse wood debris (see S5) and also provide "relatively good protection from weather and open water at this site" (see S8). Based on the information presented in Table K-1 and discussions contained in the draft EIS, we do not believe that sufficient information has been provided to demonstrate that the Little Lagoon site meets ATTF siting criteria or that any deviations from those criteria would result in insignificant impacts.

We are encouraged by the incorporation of specific resource information and description of impacts and the inclusion of the ATTF siting guidelines in Appendix K. The draft EIS does not, however, indicate how the operation of the existing and proposed new LTFs would comply with the ATTF guidelines for Monitoring/Reporting. The final EIS should present information on how existing and new LTF sites would be monitored for:

- M3. Bark accumulation (M4. Elements of bark accumulation monitoring should include but not be limited to the following:
- a. permanent transects
 - b. measurements of areal extent, outer boundary, thickness and percent coverage of bark debris.

In general, the EPA supports an alternative to log transfer which would minimize or avoid the direct, indirect, and cumulative impacts to the marine environment. The direct land to barge transfer of logs to a barge would avoid and minimize the adverse impacts of bark discharge, accumulation, shading, and compaction associated with log transfer, rafting, and storage.

The draft EIS proposes an alternative to the development of new LTFs at North Point and Rabbit Cove (Alternative D; page 2-15). Several options have been proposed to manage the timber volume between Sandborn Canal and North Point. The options include: (1) dropping logs directly into the water, consolidating within bag booms, and moving to the Little Lagoon LTF site for rafting and storage, (2) dropping logs directly into the water to be loaded onto a barge, or (3) dropping logs directly onto the barge for transportation to the mill site. EPA supports option 3, which would minimize the discharge of bark and other woody debris into the marine environment. The final EIS should further explore this option for all action alternatives. Helicopter transfer of logs directly onto barges would preclude the need for the construction of two (2) new LTFs at Rabbit Cove and North Point, and additional forest roads. Furthermore, it may not be practicable to construct two new LTFs at North Point and Rabbit Cove for short-term use and the low volume of timber.

Page 2-20 discusses 4 methods to transfer logs from land to water but does not clearly indicate which method would be used at each LTF to handle the proposed volumes. The final EIS should indicate which method would be utilized at each LTF site (and particularly for the Little Lagoon site). Without this information, it is difficult to determine the potential impacts that LTF operation would pose to the marine environment.

Table 2-5 on page 2-37 presents estimates of bark deposition/dispersion for each alternative. Unfortunately, the draft EIS fails to indicate the methodology used to derive these estimates. The final EIS should provide a discussion of the manner in which deposition/dispersion rates were estimated.

We recommend that log sorting be performed on land to minimize and/or avoid discharges to the marine environment.

Impacts on Fish Habitat and Water Quality

Information presented in the EIS indicates that fish productivity may currently be limited in some watersheds (Robert Islands Creek, East and West Forks Negro Creek) due to natural sedimentation processes. Additionally, results presented in Tables 4-19 and 4-20 indicate that the three watersheds mentioned above plus the Walter Island Creek watershed would be adversely affected with the implementation of the preferred alternative (Alternative B). Table 4-19 shows that all four watersheds would have greater than 10 percent of the timber harvest and road acres in the watershed within the rain-on-snow zone. It is difficult to understand the conclusion that "effects of timber harvesting and associated activities on peak flows...are not expected to cause measurable adverse effects" when the discussion on page 4-52 suggests that values greater than 10 percent indicate that adverse effects are likely. The results of the sediment yield analysis (Table 4-20) also suggest that "water quality standards may be exceeded" in the East Negro Creek watershed with the implementation of Alternative B. Considered collectively, we believe that these results indicate the strong need to ensure that measures designed to maximize the protection of fish habitat and water quality would be implemented, particularly in those watersheds that have been identified as being vulnerable to impacts from the proposed project.

We had great difficulty substantiating the claim on page 2-19 that bridges are proposed for all crossings of Class I streams and about 50 percent of Class II streams. In our analysis of 2 of the 6 maps presented in Appendix B, we found that not all crossings of Class I streams were identified as having bridges (the maps identify only bridges "over 40 feet"). We found that Maps 1 and 3 show a total of 10 Class I crossings with 4 bridges "over 40 feet." We also found that 7 bridges "over 40 feet" were proposed for the 18 Class II crossings indicated on these maps. Unfortunately, the road summary cards do not clearly indicate what type of crossing structure would be constructed at each stream. We feel the claim that all Class I streams would be crossed using bridges requires additional substantiating information in the final EIS. We also believe that the final EIS should indicate how the approximately "50 percent" of Class II crossings using bridges relates to the protection of fish habitat and water quality. This is particularly important since the EIS indicates that bridges are proposed where "fish habitat protection is necessary" and there are many stream crossings in the project area.

Mitigation Measures

Page 2-19 indicates that upon completion of log hauling, temporary roads "are deactivated by water barring the roadbed and removing drainage structures." It is not clear that these approaches would be employed with project implementation. Additionally, it is not clear that the approaches described would be consistent with the prescriptions identified in BMP 14.24 (Soil and Conservation Handbook, FSH 2509.22) which calls for the obliteration of temporary or short-term roads. Appendix L is equally vague by indicating that the recommendations in BMP 14.24 "may be implemented" (emphasis added). We recommend that the final EIS present a clear commitment by the Forest Service to mitigate impacts from temporary roads within the project

area by using applicable BMPs (BMP 14.24 for road closure and BMP 14.17 for stream crossing structure removal), consistent with the requirements of both the Tongass Timber Reform Act (TTRA) and Tongass Land Management Plan (TLMP).

Appendix L indicates that the majority of mitigation measures to be applied to LTFs are identified in Appendix C of the draft EIS. Unfortunately, Appendix C identifies the Road Management Objectives for the project area and does not contain mitigation measures to be applied to the construction and operation of LTFs. The discussion in Appendix L does identify mitigating measures that should be used, but fails to indicate measures that would be used. The final EIS should clearly identify all mitigation measures to be used and a commitment that they would be used with the implementation of the proposed project.

Monitoring

The Monitoring Plan presented in Appendix E makes no reference to existing monitoring strategies for either the Stikine or Chatham Areas. Consequently, it is difficult to know whether other monitoring efforts within either Area or the project area have taken place or will take place that are/would be useful in evaluating the effectiveness of Best Management Practices (BMPs) in protecting water quality and fish habitat. We believe that it is absolutely critical that the EIS report findings from past effectiveness monitoring efforts to support the reliance on Tongass Timber Reform Act (TTRA)-defined 100-foot minimum buffers for Class I and Class II streams and other BMPs for protecting beneficial uses and meeting state Water Quality Standards (WQS). The 1995 *Report to Congress - Anadromous Fish Habitat Assessment (AFHA)* indicates that 100-foot buffers are generally not sufficient on larger Class I and II streams. Similarly, the EIS should provide information indicating that the proposed practices to be employed in headwater areas will provide sufficient protection of water quality and fish habitat. Without this information, the apparent determination that fish habitat and water quality would not be significantly impacted lacks a supporting technical basis. Given the lack of information related to effectiveness monitoring on the Tongass in the EIS, we are also concerned with the relatively modest monitoring effort being proposed for the project area and the level of detail of that proposal. The "plans" for monitoring LTF bark accumulations and post-sale road use (and associated impacts) are each described in no more than 2 sentences! Monitoring is particularly important for a project of this magnitude, because it provides a check on the predictions of effects for the action alternatives. It is important to evaluate the effectiveness of planned mitigation measures in protecting resources potentially affected by future timber sales.

We are aware of a number of effectiveness monitoring efforts on the Tongass that have been initiated in the last several years (see *Report to Congress - Anadromous Fish Habitat Assessment (AFHA)*, January 1995, Appendix D and *Tongass National Forest Annual Monitoring and Evaluation Report, Fiscal Year 1994, March 1995, R10-MB-286*) and recommend that any results currently available from these studies be obtained, discussed in the final EIS, and integrated into the planning for this proposed timber sale.

In the event that results from the studies identified in the reports cited above are not available, inconclusive, or indicate that changes to BMPs may be necessary, we recommend that a monitoring plan be developed which includes the types of surveys to be conducted, location and frequency of sampling, parameters to be monitored, indicator species, budget, procedures for using data or results in plan implementation, and availability of results to interested and affected groups. *Monitoring Guidelines to Evaluate Effects of Forestry Activities on Streams in the Pacific Northwest and Alaska*, EPA/910/9-91-001, May 1991, is a useful document for developing an effective water quality monitoring plan.

Consistent with BMP 11.6, we believe that the final EIS should include a feedback mechanism which relies upon monitoring (including quantitative measurements) so that standards and guidelines, BMPs, standard operation procedures, intensity of monitoring, and timber sale administration can be adjusted when effectiveness monitoring indicates a need. Providing such a process for adjustment will ensure that mitigation measures will improve in the future and that unforeseen project-related effects are recognized and corrective actions can be taken.

Environmental Effects Outside the Project Area

The draft EIS fails to identify and evaluate potential consequences of the proposed project "outside" the project area boundaries. We believe that additional discussion of these potential impacts must be included in the EIS to satisfy the implementing regulations for NEPA (40 CFR 1502, section 1502.16). Because the proposed project would provide timber to the Ketchikan Pulp Corporation (KPC), the project would generate air and water quality impacts in the vicinity of the KPC mill at Ward Cove. Additionally, we are aware that most logs delivered to KPC usually are stored for some period of time at Thorne Bay. These impacts (if logs from this project are transported to Thorne Bay) should be addressed in the final EIS. Implementation of the proposed project would also result in impacts to Hobart Bay through the use of the existing LTF at Hobart Bay. These impacts should be evaluated in the final EIS. Some questions/issues that should be addressed in the final EIS include:

What are the current air and water quality conditions at/near the above mentioned locations and what impacts to those conditions are likely to result from each proposed project alternative?

Are there currently permits in place at these facilities? What types of permits? What is the status of those permits?

Do any of the areas that would be affected by the proposed timber sale currently exhibit air quality or water quality problems?

Thorne Bay, Hobart Bay, and Ward Cove have been identified by the State of Alaska as impaired water bodies under section 303(d) of the Clean Water Act. What are the implications of project-related activities on the quality of these water bodies?

The final EIS should include a discussion/evaluation of the direct project-related impacts "outside" of the project area.

Cooperating Agency Status

The draft EIS incorrectly identifies the Environmental Protection Agency (EPA) as a cooperating agency on this project. While the EIS correctly indicates that National Pollutant Discharge Elimination System (NPDES) permits would need to be issued by EPA for log transfer facilities (LTFs) under Section 402 of the Clean Water Act, that does not confer official cooperating agency status on EPA for this project. The responsibilities of lead and cooperating agencies are presented in the implementing regulations for the National Environmental Policy Act (40 CFR 1501, section 1501.6). As we indicated in our November 28, 1994 letter from K. Veit to G. Morrison, we were unable to accept formal cooperating agency status for this project and the Northwest Baron of Timber Sales project due to resource constraints. We look forward to working cooperatively with the Forest Service in the development of any necessary NPDES permits for the proposed LTFs in the event that the proposed project moves forward. We encourage you to contact Susan Cantor in our Anchorage office (907-271-3414) at your earliest convenience to initiate discussions related to the permitting of potential LTFs.

Purpose and Need

It is difficult to determine why a timber harvest volume between 100 and 125 million board-feet (MMBF) is explicitly identified in the purpose and need section of the draft environmental impact statement (EIS). While we understand the purpose and need for the project is 1) to satisfy elements of the KPC contract and 2) to move toward the desired future condition of the forest as identified in the Tongass Land Management Plan (TLMP), the EIS does not explain why the harvest volume associated with this particular sale is necessary to meet those needs.

We believe there are issues related to National Environmental Protection Act (NEPA) implementation that arise by explicitly specifying a harvest volume in the purpose and need section of the draft EIS. For example, in stating that the needed volume from the proposed project is 100 to 125 MMBF, we believe that the range of alternatives has been limited to those that would meet the specified volume. We believe that both the KPC contractual obligations and movement toward the desired future condition of the forest can likely be met through a wider array of harvesting options than those identified in the draft EIS (perhaps smaller, dispersed timber sales). Furthermore, in defining a specific volume for this project, we have concerns that critical decisions in the planning process (i.e., determination of the target volume) may have been made without adequate public involvement.

Additionally, we have some concerns that the specification of a target harvest volume in the purpose and need section of the draft EIS may conflict with the Forest Service's stated direction of using "ecosystem management" in their decision-making process. We believe that the

approach being taken in this EIS is to manage the ecosystem "around" the desired timber harvest level instead of identifying the elements needed to maintain a healthy ecosystem and evaluating the project alternatives in relation to those needs. We believe that a management approach which is driven by pre-defined harvest levels will not ensure maintenance of a truly healthy ecosystem within (and outside) the project area.

The draft EIS does not provide any information related to the process used in defining the target timber harvest volume, and why it is judged to be "needed." At a minimum, the final EIS should identify the process used in determining the target harvest volume identified in the draft EIS, and how that process relates to the concerns identified above. This "pipeline" analysis should present the proposed 100-125 MMBF volume identified in the draft EIS, along with all other planned timber sales (and volumes), to provide reviewers an understanding of overall harvest needs relative to the KPC contract requirements.

Affected Environment and Environmental Consequences

We are concerned with the lack of quantitative information presented in the draft EIS in general, and specifically related to compliance with Alaska Water Quality Standards. This is the case in the assessment of existing conditions as well as in reporting expected impacts associated with the project alternatives. While the discussion of the watersheds containing potential harvest units was particularly useful, it is extremely difficult to determine the current state of the watersheds within the project area (baseline conditions) or the significance of the impacts to those watersheds for each of the project alternatives. While surrogate indicators are provided throughout the EIS which give some gross indication of the potential to impact water quality in a relative sense (e.g., number of stream crossings, acres of roads and disturbed soils, etc.), there is little information provided that allows the reader to translate these indicators into what conditions presently are or are likely to be in the affected streams in an absolute sense. Because insufficient information exists to indicate whether streams within the project area currently comply with or exceed WQS, it is difficult to determine whether any of the proposed alternatives would pose unacceptable risks to water quality and fish habitat. This points out the critical need for adequate baseline monitoring information as the foundation for the evaluation of potential project-related impacts.

Water Quality Standards

The achievement of WQS for nonpoint source (NPS) activities is intended to result from the implementation of BMPs. BMPs are to be designed to achieve WQS, which would include applicable water quality criteria (WQS consist of both designated beneficial uses and the criteria necessary to protect the uses, and an antidegradation policy). In other words, the water quality criteria are the measures by which BMPs are judged to achieve water quality protection. In addition, the antidegradation policy explicitly lays out that existing beneficial uses must be fully protected.

Also, BMP application does not equal standard compliance. The key issue however, as previously stated, is that findings of effectiveness monitoring efforts on the Tongass National Forest, and in the Stikine and Chatham Areas specifically, have not been reported or referenced in this EIS. Consequently, assurances of compliance with WQS are not meaningful with this fundamental link missing. BMPs are assumed to protect water quality, but monitoring must be conducted to determine if that is truly the case. If they are not protective, then the BMPs must be revised. This reinforces the need to conduct effectiveness monitoring studies as a component of the proposed project.

Antidegradation

EPA believes that the proposed project could potentially exceed WQS so that the fisheries beneficial use will not be fully maintained, thereby violating the federal antidegradation policy. An antidegradation analysis, as specified in the Antidegradation Policy [40 CFR 131.12], should be included in the final EIS. This policy was developed to achieve the goals of the Clean Water Act, which are to restore and maintain the chemical, physical and biological integrity of the nation's waters.

The Antidegradation Policy describes three tiers of protection. Briefly:

Tier 1:

No activity is allowable which would partially or completely eliminate any existing beneficial use of a water body, whether or not that use is designated in a state's WQSs. If an activity will cause partial or complete elimination of a beneficial use, it must be avoided or adequate mitigation/preventive measures must be taken to ensure that the existing uses and the water quality to protect those uses will be fully maintained.

Tier 2:

Where the quality of the waters exceed "fishable/swimmable" levels ("high quality waters"), that quality shall be maintained and protected unless the following are completed:

- 1) a finding that such degradation is necessary to accommodate important economic or social development in the area in which the waters are located.
- 2) full satisfaction of all intergovernmental coordination and public participation provisions, and
- 3) assurance that the highest statutory and regulatory requirements and BMPs for pollutant controls are achieved.

Please note that this provision is intended to provide relief only in extraordinary circumstances where the economic and social need for the activity clearly outweighs the benefit of maintaining water quality above that required for "fishable/swimmable" water. The burden of demonstration on the party proposing such activity is very high. In any case, the activity shall not preclude the maintenance of a "fishable/swimmable" level of

water quality protection.

Tier 3:

Where "high quality waters" constitute outstanding national resources, that water shall be maintained and protected. As with the other tiers, the state determines the "tier" of the water body. If necessary, EPA can provide guidance on determining water quality status.

Federal Consistency Provisions of §319 of the Clean Water Act

The final EIS needs to fully integrate §319 of the Clean Water Act. Existing water quality conditions in National Environmental Policy Act documents need to reflect and reference the state's water quality assessment. Direct or indirect nonpoint source water quality effects need to be reduced through design and mitigation measures to ensure that the project is consistent with the state's NPS program. The contact for the Alaska Department of Conservation is:

Jim Ferguson
Forestry Services Team Leader
Alaska Department of Environmental Conservation
Phone: (907) 465-5365

Economic and Socioeconomic Analyses

The discussion of the economic impacts on the commercial fishing and recreation/tourism industries contained on page 4-127 presents little information to substantiate the claim that these economic sectors would not expected to be significantly impacted. Tables 4-39 through 4-42 present quantitative indicators of the economic impacts of the proposed project on the timber industry. Unfortunately, we were unable to locate comparable information related to the fisheries and recreation/tourism industries. If the appropriate information is presented elsewhere in the EIS, the text should be modified to clearly identify where this information can be located. Without this type of information, we believe that there is no basis for the "expectation" of insignificant impacts to these business sectors.

Page Specific Comments

- P. 1-17 Include the Executive Orders on protection of wetlands and flood plains.
- P. 2-33 Paragraph 3; Substitute "Alaska Terminal Transfer Facility (ATTF) with "Alaska Timber Task Force."
- P. 3-8 Paragraph 4, Substitute "Appendix K" for "Appendix C"

water quality protection

Tier 3

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Jim Ferguson
Forest Services Team Leader
Alaska Department of Environmental Conservation
Phone: (907) 465-2362

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Page Specific Comments

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| P. 4-17 | Include the Executive Order on protection of wetlands and flood plains |
| P. 4-33 | Paragraph 3: Substitute "Alaska Terminal Transfer Facility (ATTF) with "Alaska Timber Task Force" |
| P. 4-3 | Paragraph 4: Substitute "Appendix K" for "Appendix C" |